

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
: :
Shawn M. Dyches : No. 20-11199-MDC
Debtor : :

ANSWER TO MOTION OF MIDFIRST BANK
FOR RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362
AND CERTIFICATE OF SERVICE

1. Admitted.

2. Admitted.

3. Admitted.

4. Admitted.

5. Admitted.

6. Admitted some payments were missed but Debtor is able to pay monies now on the same. Denied that Debtor will not pay the same.

7. Denied.

8. Denied.

9. Denied.

10. No objection.

11. No response to this averment.

WHEREFORE Debtor respectfully request this Honorable Court deny Movant's Motion for Relief.

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 06/18/2021

A copy of this Answer is being served on Rebecca Ann Solarz, Esquire, and the Chapter 13 Trustee.